

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

MDL NO. 2875
Civil No. 19-02875 (RBK/JS)

**DEFENDANTS' DISCLOSURE OF PERSONAL INJURY
BELLWETHER TRIAL POOL SELECTIONS**

On behalf of the Defendants' Executive Committee, undersigned counsel hereby discloses

Defendants' Selections for the Bellwether Trial Pool:

1. Janice Brown, 1:19-cv-17394 (D.N.J.)
2. Rita Crawford, 1:20-cv-00763-RBK-JS (D.N.J.)
3. Nellie Dawson, 1:20-cv-01493-RBK-JS (D.N.J.)
4. Lana Dufrene, 1:19-cv-15633 (D.N.J.)
5. Tivis Fields, 1:20-cv-00683-RBK-JS (D.N.J.)
6. Bambi Ganim, 1:20-cv-07523-RBK-JS (D.N.J.)
7. Robert Garcia, 1:20-cv-07957-RBK-JS (D.N.J.)
8. Paulette Kennedy, 1:20-cv-07638-RBK-JS (D.N.J.)
9. Silvano Kinkela, 1:20-cv-02880-RBK-JS (D.N.J.)
10. Estate of Ronald Meeks, 1:19-cv-16209-RBK-JS (D.N.J.)
11. Crusita Murga, 1:20-cv-03596 (D.N.J.)
12. Marvella Ochs, 1:20-cv-00323-RBK-JS (D.N.J.)
13. Eugene Pate, 1:20-cv-01248-RBK-JS (D.N.J.)

14. Michael Svebek, 1:19-cv-20609-RBK-JS (D.N.J.)
15. Durl Welch, 1:20-cv-07999-RBK-JS (D.N.J.)

In making this disclosure, Defendants have not waived their right to remand or transfer any action in this MDL to a court of proper venue for trial under 28 U.S.C. § § 1391 and 1406(a) and *Lexecon Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998) upon completion of pre-trial proceedings. All jurisdiction and venue defenses are hereby expressly preserved.

Date: January 15, 2021

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/s/ Victoria Davis Lockard

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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2021 I served the foregoing Defendants' Disclosure of Personal Injury Bellwether Trial Pool Selections, on the parties' liaison counsel via email in accordance with the agreement of the parties.

/s/ Victoria Davis Lockard